

**ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK P.C.**

875 Third Avenue, 9<sup>th</sup> Floor  
New York, New York 10022

Fred B. Ringel

Steven B. Eichel

*Attorneys for the Debtors and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

Chapter 11

In re:

**WB BRIDGE HOTEL LLC and  
159 BROADWAY MEMBER LLC,**

Case No.: 20-23288-rdd and  
20-23289-rdd  
(Jointly Administered)

Debtors.

-----X

**DECLARATION OF DAVID GOLDWASSER  
IN SUPPORT OF DEBTORS' OBJECTION TO MOTION  
FOR ORDER ALLOWING LATE FILING OF PROOF OF CLAIM**

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**David Goldwasser** declares under penalty of perjury that these  
statements are true and correct:

1. I am the managing member of GC Realty Advisors, LLC, the manager of WB Bridge Hotel LLC ("WB Bridge") and 159 Broadway Member LLC ("159 Broadway" and defined together with WB Bridge, as the "Debtors"). I am thoroughly familiar with the facts set forth below.

2. Attached as **Exhibit A** is a true and correct copy of the Certificate of Service for the Notice of Deadline Requiring Filing of Claims Against Debtors On or Before April 21, 2021 and the Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof.

3. Attached as **Exhibit B** is a true and correct copy of the Certificate of Service regarding the Notice of Chapter 11 Bankruptcy Case.

4. Attached as **Exhibit C** is a true and correct copy is Schedule D for WB Bridge Hotel LLC.

5. Attached as **Exhibit D** is a true and correct copy of email correspondence and invoices with Simpson Sumpertz & Heger.

6. Attached as **Exhibit E** is a true and correct copy of the May 18, 2021 letter.

Under 28 U.S.C. §1746, I declare under penalty of perjury that these statements are true and correct.

Dated: June 4, 2021  
New York, New York

/s/ David Goldwasser  
David Goldwasser

## **EXHIBIT A**

**ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK P.C.**

875 Third Avenue  
New York, New York 10022  
Fred B. Ringel  
Lori Schwartz  
*Proposed Attorneys for the Debtor and Debtor in  
Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

Chapter 11

In re:

**WB BRIDGE HOTEL LLC and  
159 BROADWAY MEMBER LLC,**

Case No.: 20-23288-rdd and  
20-23289-rdd  
(Joint Administration Requested)

Debtors.

-----X

**CERTIFICATE OF SERVICE**

NATHANAEL F. MEYERS, hereby certifies under penalty of perjury:

1. I am not a party to the action, am over 18 years of age and reside in Hamilton, New Jersey.

2. On the 16<sup>th</sup> day of March, 2021, I caused to be served:

- Notice of Deadline Requiring Filing of Proofs of Claim Against the Debtors On or Before April 21, 2021 [Doc. No. 45-1];

- Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof [Doc. No. 45]; and

- Proof of Claim Form via FIRST CLASS MAIL upon all parties on the attached Service List by depositing true copies of same enclosed in post-paid, properly addressed wrappers in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Dated: March 17, 2021

/s/ Nathanael F. Meyers  
**Nathanael F. Meyers**

**WB/159 Master Service List as of 3/16/21**

ADS ENGINEERS  
45 BROADWAY, SUITE 1220  
NEW YORK, NY 10006

AFS FENCING INC.  
59 COLLINS AVENUE  
SPRING VALLEY, NY 10977

ALLIED SAFETY CONSULTANTS INC  
405 LEXINGTON AVE, 9TH FLOOR.  
NEW YORK, NY 10174

AMB MECHANICAL INC.  
431 WILLOUGHBY AVE  
BROOKLYN, NY 11205

ARCHITECTURAL TESTING INC  
- INTERTEK  
130 DERRY COURT  
YORK, PA 17406

B&H BUILDERS GROUP  
5308 13TH AVENUE, #503  
BROOKLYN, NY 11219

BERRYS COOLING HEATING  
15 MEADOW ST.  
BROOKLYN, NY 11206

BEST SAFETY GROUP INC  
405 LEXINGTON AVENUE  
FLOORS 1, 7-9  
NEW YORK, NY 10174

BEST SUPER CLEANING  
5014 16TH AVE. SUITE #231  
BROOKLYN, NY 11204

BIG APPLE TESTING  
100-03 94TH AVENUE  
OZONE PARK, NY 11416

C VIEWS  
1069 56TH ST.  
BROOKLYN, NY 11219

C.A.C. INDUSTRIES, INC.  
54-08 VERNON BLVD  
LONG ISLAND CITY, NY 11101

CASTLE TERMITE & PEST CONTROL  
PO BOX 206  
HILLSDALE, NJ 07642

CLEVINGER FRABLE LAVALLEE, INC  
39 WESTMORELAND AVENUE  
SUITE 32  
WHITE PLAINS, NY 10606

CORNELL CROWN LLC  
75 HUNTINGTON STRET  
BROOKLYN, NY 11231

CORNELL REALTY HOLDINGS LLC  
75 HUNTINGTON STEET  
BROOKLYN, NY 11231

CORP. COUNSEL FOR NYC  
100 CHURCH STREET  
NEW YORK, NY 10007

DANIEL E. KANE, P.C.  
2070 TRUMBAUERSVILLE RD  
QUAKERTOWN, PA 18951

ELLANA  
32 BROADWAY, 8TH FLOOR  
NEW YORK, NY 10004

EMPIRE STATE LAYOUT, INC.  
1786 BELLMORE AVENUE  
BELLMORE, NY 11710

ENVIRONMENTAL BUSINESS CONSULT  
1808 MIDDLE COUNTRY RD  
RIDGE, NY 11961

FIRST QUALITY ELECTRIC CORP.  
75 HUNTINGTON STREET  
BROOKLYN, NY 11231

FOC NYC  
130 BARROW STREET, STE 511  
NEW YORK, NY 10014

INTERNAL REVENUE SERVICE  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

JENNY C. AHN ATTORNEY  
- KIM 149 BROADWAY  
167-20 NORTHERN BOULEVARD  
FLUSHING, NY 11358

JOHN SARACCO ARCHITECT LLC  
PO BOX 245  
BOONTON, NJ 07005

KCC STONE  
199 LEE AVE #627  
BROOKLYN, NY 11211

KRAMER LEVIN NAFTALIS  
& FRANKEL LLP  
1177 6TH AVE  
NEW YORK, NY 10036

LONGMAN LINDSEY  
200 WEST 41ST STREET  
SUITE 1100  
NEW YORK, NY 10036

MAGELLAN CONCRETE STRUCTURES  
CORP  
233 POWELL ST.  
BROOKLYN, NY 11212

MARK WHOLESALE  
808 BEDFORD AVE STE 2-B  
BROOKLYN, NY 11205

MASTER ROOFING AND SIDING  
ONE PARAGON DRIVE SUITE 122  
MONTVALE, NJ 07645

MERIDIAN LAYOUT INC  
3280 SUNRISE HWY, SUITE 341  
WANTAGH, NY 11793

METROPOLITAN REALTY EXEMPTIONS  
381 SOUTH 5TH STREET  
BROOKLYN, NY 11211

MLS SERVICE GROUP INC  
5308 13TH AVENUE SUITE #150  
BROOKLYN, NY 11219

MORROW EQUIPMENT COMPANY LLC  
3218 PRINGLE ROAD SE  
SALEM, OR 97302

MWHARRIS LIGHTING STUDIO LLC  
14 OREGON TRAIL  
MEDFORD, NJ 08055

NETWORK TECHNOLOGIES, INC  
320 SOUTH PERRY STREET  
LAWRENCEVILLE, GA 30046

NEW YORK STATE DEPT. OF FINANC  
ATTN: BANKRUPTCY SPECIAL PROC  
PO BOX 5300  
ALBANY, NY 12205

NYC DEPT. OF FINANCE  
345 ADAMS STREET, 3RD FL.  
ATTN: LEGAL AFFAIRS  
BROOKLYN, NY 11201

OFFICE OF THE ATTORNEY GENERAL  
28 LIBERTY ST.  
NEW YORK, NY 10005

OHZ REMOTE GUARDING  
1980 50TH ST  
BROOKLYN, NY 11204

P/KAUFMANN  
P.O BOX 418440  
BOSTON, MA 02241

PIONEER WINDOW MFG CORP  
3 EXPRESSWAY PLAZA, SUITE 221  
ROSLYN HEIGHTS, NY 11577



PLUMBING NYC INC  
517 DEGRAW STREET, SUITE A  
BROOKLYN, NY 11217

PRINT ON BROADWAY  
389 BERRY ST.  
BROOKLYN, NY 11249

RA ENGINEERING LLP  
1392 MADISON AVENUE, #311  
NEW YORK, NY 10029  
ATTN: NIDAL ALI SAAB

REG HOUGH ASSOCIATES  
P.O. BOX 482  
ALLENWOOD, NJ 08720

RENT A UNIT NY INC  
543 BEDFORD AVE. SUITE #243  
BROOKLYN, NY 11211

ROTAVELE ELEVATOR QUEENS CONST  
414 SENECA AVE  
RIDGEWOOD, NY 11385

SAM MAINTENANCE SERVICE INC.  
418 MELROSE ST  
BROOKLYN, NY 11237  
ATTN: SHMUEL FUCHS

SIMPSON GUMPERTZ & HAGER INC  
480 TOTTEN POND ROAD  
WALTHAM, MA 02451

SOHO MYRIAD INC  
1250 MENLO DRIVE NW  
STE. C  
ATLANTA, GA 30318

SPARK LIGHTING  
347 37TH STREET  
BROOKLYN, NY 11232

SPECTRUM PRECISION PAINTING  
- MOSHE MILL  
1072 MADISON AVE  
LAKEWOOD, NJ 08701

STONEHILL AND TAYLOR ARCHITECT  
31 WEST 27TH STREET, 5TH FLOOR  
NEW YORK, NY 10001

SUB ENTERPRISES INC.  
435 BELLVALE RD  
CHESTER, NY 10918

SYNDICATE DEVELOPMENT SERVICES  
1732 FIRST AVENUE #21183  
NEW YORK, NY 10128

THE BAC GROUP  
366 BROADWAY  
BROOKLYN, NY 11211

THE YARD OPERATING COMPANY LLC  
195 BROADWAY  
BROOKLYN, NY 11211

TRIAS MANAGEMENT SERVICES, INC  
 306 COMMACK ROAD, SUITE 100  
 COMMACK, NY 11725

US ATTY OFFICE -SDNY  
86 CHAMBERS STREET  
ATTN: TAX AND BANKRUPTCY  
NEW YORK, NY 10007

WALSH GLASS AND METAL, INC.  
904 NEPPERHAN AVE  
YONKERS, NY 10703

WEYLIN SEYMOUR LLC  
834 DRIGGS AVENUE  
BROOKLYN, NY 11211  
ATTN: CARLOS PEREZ SAN MARTIN

WSP USA CORP  
4139 OREGON PIKE  
EPHRATA, PA 175

William K. Harrington, United States Trustee  
U.S. Department of Justice  
Office of the United States Trustee  
201 Varick Street, Room 1006  
New York, NY 10014  
(Attn.: Andrea B. Schwartz, Esq.)

KRISS & FEUERSTEIN LLP  
Jerold C. Feuerstein, Esq.  
Stuart L. Kossar, Esq.  
Daniel N. Zinman, Esq.  
360 Lexington Avenue, Suite 1200  
New York, New York 10017

Jerry A. Montag, Esq.  
SEYFARTH SHAW LLP  
620 Eighth Avenue  
New York, NY 10018

159 BROADWAY 1 LLC  
C/O MADISON REALTY CAPITAL  
520 MADISON AVE., SUITE 3501  
NEW YORK, NY 10022

ARCHITECTURAL TESTING INC.  
P.O. BOX 419241  
BOSTON, MA 02241-9241

Brian Powers, Esq.  
SilvermanAcampora LLP  
100 Jericho Quadrangle  
Suite 300  
Jericho, NY 11753

Ronald J. Friedman, Esq.  
SilvermanAcampora LLP  
100 Jericho Quadrangle  
Suite 300  
Jericho, NY 11753

MAGELLAN CONCRETE STRUCTURES CORP  
GUTMAN WEISS, P.C.  
2276 65TH STREET  
BROOKLYN, NY 11204

## **EXHIBIT B**

<b>Information to identify the case:</b>	
Debtor <b>WB Bridge Hotel LLC</b> Name	EIN: 82-3412355
United States Bankruptcy Court Southern District of New York	Date case filed for chapter: 11 12/21/20
Case number: 20-23288-rdd	

**Official Form 309F1 (For Corporations or Partnerships)**  
**Notice of Chapter 11 Bankruptcy Case**

02/20

**For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.**

**This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.**

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at [pacer.uscourts.gov](http://pacer.uscourts.gov)).

**The staff of the bankruptcy clerk's office and the office of the U.S. Trustee cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

<b>1. Debtor's full name</b>	WB Bridge Hotel LLC	
<b>2. All other names used in the last 8 years</b>		
<b>3. Address</b>	c/o GC Realty Advisors, LLC 3284 N. 29th Court Hollywood, FL 33020	
<b>4. Debtor's attorney</b> Name and address	Fred B. Ringel Robinson Brog Leinwand Greene Genovese & Gluck P.C. 875 Third Avenue 9th Floor New York, NY 10022	Contact phone (212) 603-6300 Email: <a href="mailto:fbr@robinsonbrog.com">fbr@robinsonbrog.com</a>
<b>5. Bankruptcy clerk's office</b> Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at <a href="http://pacer.uscourts.gov">pacer.uscourts.gov</a> .	300 Quarropas Street White Plains, NY 10601  Clerk of the Bankruptcy Court: Vito Genna	Office Hours: <u>Monday – Friday 8:30 AM – 5:00 PM</u>  Contact phone 914-467-7250  Date: 12/23/20
<b>6. Meeting of creditors</b> The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	<b>January 14, 2021 at 01:30 PM</b>  The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.  <b>Cell phones are not permitted in the Courthouse without an Attorney Secure Pass which can be obtained at the U.S. District Court Clerk's Office.</b>	Location:  <b>Teleconference *ONLY*, Contact UST's Office for direction, <a href="https://www.justice.gov/ust-regions-r02">https://www.justice.gov/ust-regions-r02</a></b>

**For more information, see page 2 >**

<p><b>7. Proof of claim deadline</b></p>	<p><b>Deadline for filing proof of claim:</b> Not yet set. If a deadline is set, the court will send you another notice.</p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at <a href="http://www.uscourts.gov">www.uscourts.gov</a> or any bankruptcy clerk's office.</p> <p>All Proofs of Claim must be filed electronically on the Court's website or mailed to the court at the address listed in section 5.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> <li>• your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>;</li> <li>• you file a proof of claim in a different amount; or</li> <li>• you receive another notice.</li> </ul> <p>If your claim is not scheduled or if your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the bankruptcy clerk's office or online at <a href="http://pacer.uscourts.gov">pacer.uscourts.gov</a>.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>
<p><b>8. Exception to discharge deadline</b> The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If 523(c) applies to your claim and you seek to have it exempted from discharge, you must start a judicial proceeding by filing a complaint.</p>
<p><b>9. Creditors with a foreign address</b></p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>
<p><b>10. Filing a Chapter 11 bankruptcy case</b></p>	<p>Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.</p>
<p><b>11. Discharge of debts</b></p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.</p>

In re:  
WB Bridge Hotel LLC  
Debtor(s)

Case No. 20-23288-rdd  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0208-7

User:

Page 1 of 3

Date Rcvd: Dec 23, 2020

Form ID: 309F1

Total Noticed: 75

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 25, 2020:

Recip ID	Recipient Name and Address
db	+ WB Bridge Hotel LLC, c/o GC Realty Advisors, LLC, 3284 N. 29th Court, Hollywood, FL 33020-1320
aty	+ Jerold C. Feuerstein, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York, NY 10017-6555
aty	+ Jerry A. Montag, Seyfarth Shaw LLP, 620 Eighth Ave., New York, NY 10018-1618
aty	+ Michael Ryan Pinkston, Seyfarth Shaw LLP, 560 Mission Street, Suite 3100, San Francisco, CA 94105-2992
smg	N.Y. State Unemployment Insurance Fund, P.O. Box 551, Albany, NY 12201-0551
smg	+ United States Attorney's Office, Southern District of New York, Attention: Tax & Bankruptcy Unit, 86 Chambers Street, Third Floor, New York, NY 10007-1825
7797728	+ 159 Broadway 1 LLC, c/o Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York, NY 10017-6502
7798306	+ ADS ENGINEERS, 45 BROADWAY, SUITE 1220, NEW YORK, NY 10006-3798
7798308	+ ALLIED SAFETY CONSULTANTS INC, 405 LEXINGTON AVE, 9TH FLOOR., NEW YORK, NY 10174-1000
7798309	+ AMB MECHANICAL INC., 431 WILLOUGHBY AVE, BROOKLYN, NY 11205-4764
7798310	+ ARCHITECTURAL TESTING INC, INTERTEK, 130 DERRY COURT, YORK, PA 17406-8405
7798311	+ B&H BUILDERS GROUP, 5308 13TH AVENUE, #503, BROOKLYN, NY 11219-5198
7798312	+ BERRYS COOLING HEATING, 15 MEADOW ST., BROOKLYN, NY 11206-1710
7798313	+ BEST SAFETY GROUP INC, 405 LEXINGTON AVENUE, FLOORS 1, 7-9, NEW YORK, NY 10174-0002
7798314	+ BEST SUPER CLEANING, 5014 16TH AVE. SUITE #231, BROOKLYN, NY 11204-1404
7798315	+ BIG APPLE TESTING, 100-03 94TH AVENUE, OZONE PARK, NY 11416-1701
7798316	+ C VIEWS, 1069 56TH ST., BROOKLYN, NY 11219-4404
7798317	+ C.A.C. INDUSTRIES, INC., 54-08 VERNON BLVD, LONG ISLAND CITY, NY 11101-5903
7798318	+ CASTLE TERMITE & PEST CONTROL, PO BOX 206, HILLSDALE, NJ 07642-0206
7798319	+ CLEVINGER FRABLE LAVALLEE, INC, 39 WESTMORELAND AVENUE, SUITE 32, WHITE PLAINS, NY 10606-1970
7798320	+ CORNELL CROWN LLC, 75 HUNTINGTON STREET, BROOKLYN, NY 11231-0877
7798321	+ CORNELL REALTY HOLDINGS LLC, 75 HUNTINGTON STREET, BROOKLYN, NY 11231-0877
7798322	+ CORP. COUNSEL FOR NYC, 100 CHURCH STREET, NEW YORK, NY 10007-2668
7798323	+ DANIEL E. KANE, P.C., 2070 TRUMBAUERSVILLE RD, QUAKERTOWN, PA 18951-2265
7798324	+ ELLANA, 32 BROADWAY, 8TH FLOOR, NEW YORK, NY 10004-1655
7798325	+ EMPIRE STATE LAYOUT, INC., 1786 BELLMORE AVENUE, BELLMORE, NY 11710-5522
7798326	+ ENVIRONMENTAL BUSINESS CONSULT, 1808 MIDDLE COUNTRY RD, RIDGE, NY 11961-2406
7798327	+ FIRST QUALITY ELECTRIC CORP., 75 HUNTINGTON STREET, BROOKLYN, NY 11231-0877
7798328	+ FOC NYC, 130 BARROW STREET, STE 511, NEW YORK, NY 10014-2866
7798330	+ JENNY C. AHN ATTORNEY, KIM 149 BROADWAY, 167-20 NORTHERN BOULEVARD, FLUSHING, NY 11358-2639
7798331	+ JOHN SARACCO ARCHITECT LLC, PO BOX 245, BOONTON, NJ 07005-0245
7797911	+ Jerry A. Montag, Esq., SEYFARTH SHAW LLP, 620 Eighth Avenue, New York, NY 10018, (212) 218-5500 jmontag@seyfarth.com 10018-1618
7798332	+ KCC STONE, 199 LEE AVE #627, BROOKLYN, NY 11211-8919
7798333	+ KRAMER LEVIN NAFTALIS, & FRANKEL LLP, 1177 6TH AVE, NEW YORK, NY 10036-2714
7798334	+ LONGMAN LINDSEY, 200 WEST 41ST STREET, SUITE 1100, NEW YORK, NY 10036-7213
7798335	+ MAGELLAN CONCRETE STRUCTURES, CORP, 233 POWELL ST., BROOKLYN, NY 11212-8134
7798336	+ MARK WHOLESALE, 808 BEDFORD AVE STE 2-B, BROOKLYN, NY 11205-1574
7798337	+ MASTER ROOFING AND SIDING, ONE PARAGON DRIVE SUITE 122, MONTVALE, NJ 07645-1728
7798338	+ MERIDIAN LAYOUT INC, 3280 SUNRISE HWY, SUITE 341, WANTAGH, NY 11793-4024
7798339	+ METROPOLITAN REALTY EXEMPTIONS, 381 SOUTH 5TH STREET, BROOKLYN, NY 11211-7507
7798340	+ MLS SERVICE GROUP INC, 5308 13TH AVENUE SUITE #150, BROOKLYN, NY 11219-5198

District/off: 0208-7

User:

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Date Rcvd: Dec 23, 2020

Form ID: 309F1

Total Noticed: 75

7798341 + MORROW EQUIPMENT COMPANY LLC, 3218 PRINGLE ROAD SE, SALEM, OR 97302-6313  
7798342 + MWHARRIS LIGHTING STUDIO LLC, 14 OREGON TRAIL, MEDFORD, NJ 08055-9046  
7798343 #+ NETWORK TECHNOLOGIES, INC, 320 SOUTH PERRY STREET, LAWRENCEVILLE, GA 30046-4839  
7798345 + NYC DEPT. OF FINANCE, 345 ADAMS STREET, 3RD FL., ATTN: LEGAL AFFAIRS, BROOKLYN, NY 11201-3739  
7798346 + OFFICE OF THE ATTORNEY GENERAL, 28 LIBERTY ST., NEW YORK, NY 10005-1400  
7798347 + OHZ REMOTE GUARDING, 1980 50TH ST, BROOKLYN, NY 11204-1312  
7798348 + P/KAUFMANN, P.O BOX 418440, BOSTON, MA 02241-8440  
7798349 + PIONEER WINDOW MFG CORP, 3 EXPRESSWAY PLAZA, SUITE 221, ROSLYN HEIGHTS, NY 11577-2033  
7798350 + PLUMBING NYC INC, 517 DEGRAW STREET, SUITE A, BROOKLYN, NY 11217-3011  
7798351 + PRINT ON BROADWAY, 389 BERRY ST., BROOKLYN, NY 11249-6036  
7798352 + RA ENGINEERING LLP, 512 7TH AVENUE, 6TH FLOOR, NEW YORK, NY 10018-4603  
7798353 + REG HOUGH ASSOCIATES, P.O. BOX 482, ALLENWOOD, NJ 08720-0482  
7798354 + RENT A UNIT NY INC, 543 BEDFORD AVE. SUITE #243, BROOKLYN, NY 11211-8511  
7798355 + ROTAVELE ELEVATOR QUEENS CONST, 414 SENECA AVE, RIDGEWOOD, NY 11385-1453  
7798356 + SAM MAINTENANCE SERVICE INC., 418 MELROSE ST, BROOKLYN, NY 11237-2060  
7798357 + SIMPSON GUMPERTZ & HAGER INC, 480 TOTTEN POND ROAD, WALTHAM, MA 02451-1908  
7798358 + SOHO MYRIAD INC, 1250 MENLO DRIVE NW, STE. C, ATLANTA, GA 30318-4171  
7798359 + SPARK LIGHTING, 347 37TH STREET, BROOKLYN, NY 11232-2505  
7798360 + SPECTRUM PRECISION PAINTING, MOSHE MILL, 1072 MADISON AVE, LAKEWOOD, NJ 08701-2650  
7798361 + STONEHILL AND TAYLOR ARCHITECT, 31 WEST 27TH STREET, 5TH FLOOR, NEW YORK, NY 10001-6950  
7798362 + SUB ENTERPRISES INC., 435 BELLVALE RD, CHESTER, NY 10918-3115  
7798363 + SYNDICATE DEVELOPMENT SERVICES, 1732 FIRST AVENUE #21183, NEW YORK, NY 10128-5177  
7798364 + THE BAC GROUP, 366 BROADWAY, BROOKLYN, NY 11211-7539  
7798365 + THE YARD OPERATING COMPANY LLC, 195 BROADWAY, BROOKLYN, NY 11211-6128  
7798366 + TRIAS MANAGEMENT SERVICES, INC, 306 COMMACK ROAD, SUITE 100, COMMACK, NY 11725-3433  
7798367 + US ATTY OFFICE -SDNY, 86 CHAMBERS STREET, ATTN: TAX AND BANKRUPTCY, NEW YORK, NY 10007-1825  
7798368 + WALSH GLASS AND METAL, INC., 904 NEPPERHAN AVE, YONKERS, NY 10703-1704  
7798369 + WEYLIN SEYMOUR LLC - CARLOS, 175 BROADWAY, BROOKLYN, NY 11211-6129  
7798370 + WSP USA CORP, 4139 OREGON PIKE, EPHRATA, PA 17522-9550

TOTAL: 70

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID aty	Notice Type: Email Address Email/Text: fbr@robinsonbrog.com	Date/Time Dec 23 2020 19:28:00	Recipient Name and Address Fred B. Ringel, Robinson Brog Leinwand Greene Genovese &, Gluck P.C., 875 Third Avenue, 9th Floor, New York, NY 10022
smg	Email/Text: nys.dtf.bcnnotice@tax.ny.gov	Dec 23 2020 19:29:00	New York State Tax Commission, Bankruptcy/Special Procedures Section, P.O. Box 5300, Albany, NY 12205-0300
ust	+ Email/Text: ustregion02.br.ecf@usdoj.gov	Dec 23 2020 19:28:00	United States Trustee, Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, NY 10014-7016
7798329	EDI: IRS.COM	Dec 24 2020 00:28:00	INTERNAL REVENUE SERVICE, PO BOX 7346, PHILADELPHIA, PA 19101-7346
7798344	+ Email/Text: nys.dtf.bcnnotice@tax.ny.gov	Dec 23 2020 19:29:00	NEW YORK STATE DEPT. OF FINANC, ATTN: BANKRUPTCY SPECIAL PROC, PO BOX 5300, ALBANY, NY 12205-0300

TOTAL: 5

**BYPASSED RECIPIENTS**

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		159 Broadway I LLC
cr		159 Broadway Mezz LLC
smg	*	Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101-7346
7798307	##+	AFS FENCING INC., 59 COLLINS AVENUE, SPRING VALLEY, NY 10977-4743



District/off: 0208-7

User:

Page 3 of 3

Date Rcvd: Dec 23, 2020

Form ID: 309F1

Total Noticed: 75

TOTAL: 2 Undeliverable, 1 Duplicate, 1 Out of date forwarding address

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 25, 2020

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 23, 2020 at the address(es) listed below:

Name	Email Address
Fred B. Ringel	on behalf of Debtor WB Bridge Hotel LLC fbr@robinsonbrog.com
Jerold C. Feuerstein	on behalf of Creditor 159 Broadway 1 LLC jfeuerstein@kandflp.com skossar@kandflp.com;litigation@kandflp.com;cvalenzuela@kandflp.com;dzinman@kandflp.com
Jerry A. Montag	on behalf of Creditor 159 Broadway Mezz LLC jmontag@seyfarth.com gakerman@seyfarth.com;Nycmanagingclerksoffice@seyfarth.com
Michael Ryan Pinkston	on behalf of Creditor 159 Broadway Mezz LLC rpinkston@seyfarth.com jmcdermott@seyfarth.com
United States Trustee	USTPRegion02.NYECF@USDOJ.GOV

TOTAL: 5

## **EXHIBIT C**

Fill in this information to identify the case:

Debtor name **WB BRIDGE HOTEL LLC**

United States Bankruptcy Court for the: **SOUTHERN DISTRICT OF NEW YORK**

Case number (if known) **20-23288**

☐ Check if this is an amended filing

Official Form 206D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible.

1. Do any creditors have claims secured by debtor's property?

- ☐ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List Creditors Who Have Secured Claims

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

		Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim
2.1	<b>159 Broadway 1 LLC</b> Creditor's Name  <b>444 Madison Ave.</b> <b>41st Fl.</b> <b>New York, NY 10022</b> Creditor's mailing address  Creditor's email address, if known  Date debt was incurred  Last 4 digits of account number  Do multiple creditors have an interest in the same property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.	<b>Describe debtor's property that is subject to a lien</b> <b>Real property and improvements located at 159 Broadway, Brooklyn, New York</b>  <b>Value subject to appraisal</b>  <b>Describe the lien</b>  Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)  As of the petition filing date, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed	<b>\$24,000,000.00</b>  <b>Unknown</b>
2.2	<b>ADS Engineers</b> Creditor's Name  <b>45 Broadway, Suite 1220</b> <b>New York, NY 10006</b> Creditor's mailing address  Creditor's email address, if known  Date debt was incurred  Last 4 digits of account number  Do multiple creditors have an interest in the same property?	<b>Describe debtor's property that is subject to a lien</b>  <b>Describe the lien</b>  Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)  As of the petition filing date, the claim is: Check all that apply	<b>\$23,446.00</b>  <b>\$0.00</b>

Debtor **WB BRIDGE HOTEL LLC** Case number (if known) **20-23288**

- ☒ No  
☐ Yes. Specify each creditor, including this creditor and its relative priority.
- ☐ Contingent  
☐ Unliquidated  
☒ Disputed

2.3	Meridian Layout Inc	Describe debtor's property that is subject to a lien	\$19,845.00	\$0.00
Creditor's Name <b>3280 Sunrise Hwy, Suite 341</b> <b>Wantagh, NY 11793</b>				
Creditor's mailing address		Describe the lien		
Creditor's email address, if known		Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
Date debt was incurred		Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)		
Last 4 digits of account number		As of the petition filing date, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed		
Do multiple creditors have an interest in the same property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.				

2.4	Rotavele Elevator Queens Const	Describe debtor's property that is subject to a lien	\$201,100.00	\$0.00
Creditor's Name <b>414 Seneca Ave</b> <b>Ridgewood, NY 11385</b>				
Creditor's mailing address		Describe the lien		
Creditor's email address, if known		Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
Date debt was incurred		Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)		
Last 4 digits of account number		As of the petition filing date, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed		
Do multiple creditors have an interest in the same property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.				

2.5	Sam Maintenance Service Inc.	Describe debtor's property that is subject to a lien	\$19,933.00	\$0.00
Creditor's Name <b>418 Melrose St</b> <b>Brooklyn, NY 11237</b>				
Creditor's mailing address		Describe the lien		

Debtor	<b>WB BRIDGE HOTEL LLC</b>	Case number (if known)	<b>20-23288</b>
Name			
Creditor's email address, if known		<b>Is the creditor an insider or related party?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
<b>Date debt was incurred</b>		<b>Is anyone else liable on this claim?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)	
<b>Last 4 digits of account number</b>			
<b>Do multiple creditors have an interest in the same property?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.		<b>As of the petition filing date, the claim is:</b> Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed	

2.6	<b>Simpson Gumpertz &amp; Hager Inc</b>	<b>Describe debtor's property that is subject to a lien</b>	<b>\$33,620.00</b>	<b>\$0.00</b>
Creditor's Name				
<b>480 Totten Pond Road Waltham, MA 02451</b>				
Creditor's mailing address		<b>Describe the lien</b>		
Creditor's email address, if known		<b>Is the creditor an insider or related party?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
<b>Date debt was incurred</b>		<b>Is anyone else liable on this claim?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)		
<b>Last 4 digits of account number</b>				
<b>Do multiple creditors have an interest in the same property?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.		<b>As of the petition filing date, the claim is:</b> Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed		

2.7	<b>Stonehill and Taylor Architect</b>	<b>Describe debtor's property that is subject to a lien</b>	<b>\$213,931.00</b>	<b>\$0.00</b>
Creditor's Name				
<b>31 West 27th Street, 5th Floor New York, NY 10001</b>				
Creditor's mailing address		<b>Describe the lien</b>		
Creditor's email address, if known		<b>Is the creditor an insider or related party?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		
<b>Date debt was incurred</b>		<b>Is anyone else liable on this claim?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)		
<b>Last 4 digits of account number</b>				
<b>Do multiple creditors have an interest in the same property?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.		<b>As of the petition filing date, the claim is:</b> Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed		

Debtor **WB BRIDGE HOTEL LLC** Case number (if known) **20-23288**  
Name

<b>2.8</b>	<b>Sub Enterprises Inc.</b>	<b>Describe debtor's property that is subject to a lien</b>	<b>\$276,962.00</b>	<b>\$0.00</b>
Creditor's Name				
<b>435 Bellvale Rd</b>				
<b>Chester, NY 10918</b>				
Creditor's mailing address		<b>Describe the lien</b>		
Creditor's email address, if known		<b>Is the creditor an insider or related party?</b>		
		<input checked="" type="checkbox"/> No		
		<input type="checkbox"/> Yes		
<b>Date debt was incurred</b>		<b>Is anyone else liable on this claim?</b>		
		<input checked="" type="checkbox"/> No		
<b>Last 4 digits of account number</b>		<input type="checkbox"/> Yes. Fill out <i>Schedule H: Creditors</i> (Official Form 206H)		
<b>Do multiple creditors have an interest in the same property?</b>		<b>As of the petition filing date, the claim is:</b>		
<input checked="" type="checkbox"/> No		Check all that apply		
<input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.		<input type="checkbox"/> Contingent		
		<input type="checkbox"/> Unliquidated		
		<input checked="" type="checkbox"/> Disputed		

3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.

**\$24,788,837.**  
**00**

**Part 2: List Others to Be Notified for a Debt Already Listed in Part 1**

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address

On which line in Part 1 did you enter the related creditor?

Last 4 digits of account number for this entity

## **EXHIBIT D**

**From:** Pinches Herman <herman@cornellrealty.com>  
**Sent:** Tuesday, May 25, 2021 11:18 AM  
**To:** Yitz Taub  
**Subject:** SGH invoice 266147.  
**Attachments:** Project 180097.01-DESG Package 0266147 2019-07-09 08-28-21.pdf

Please see below their company signature and see address, and also see Invoice attached also same address, so im not sure what they are talking about.

----- Forwarded message -----

From: **Paul E. Aronson** <[PEAronson@sgh.com](mailto:PEAronson@sgh.com)>  
Date: Tue, Jul 9, 2019 at 8:28 AM  
Subject: SGH invoice 266147  
To: [moshe@cornellrealty.com](mailto:moshe@cornellrealty.com) <[moshe@cornellrealty.com](mailto:moshe@cornellrealty.com)>, [cadler@cornellrealty.com](mailto:cadler@cornellrealty.com) <[cadler@cornellrealty.com](mailto:cadler@cornellrealty.com)>, David J. Artigas <[DJArtigas@sgh.com](mailto:DJArtigas@sgh.com)>, [shragy@cornellrealty.com](mailto:shragy@cornellrealty.com) <[shragy@cornellrealty.com](mailto:shragy@cornellrealty.com)>

Here is SGH Invoice 266147 related to the following project.

SGH Project #: 180097.01-DESG  
SGH Project Name: Building Enclosure Bid and Construction Phase Consulting Services, Moxy Hotel & Residences, 159 Broadway, Brooklyn, NY  
Reference #:

Please let me know if you have questions or need anything else.

Thank you,

Paul

**Paul E. Aronson**  
Project Accountant III

**SIMPSON GUMPERTZ & HEGER**

| Engineering of Structures and Building Enclosures

480 Totten Pond Road  
Waltham, MA 02451

781.907.9000 main  
781.907.9137 direct  
781.907.9009 fax  
[www.sgh.com](http://www.sgh.com)



**SIMPSON GUMPERTZ & HEGER**



Engineering of Structures  
and Building Enclosures

**TAX ID: 04-2256923**  
**REMIT PAYMENT TO:**  
**PO Box 843476**  
**Boston, MA 02284-3476**

Mr. Moshe Rosen  
Cornell Realty Management, LLC  
As Agent: WB Bridge Hotel LLC  
75 huntington Avenue  
Brooklyn, NY 11231

July 9, 2019  
Project No: 180097.01-DESG  
Invoice No: 0266147

Building Enclosure Bid and Construction Phase Consulting Services, Moxy Hotel & Residences, 159 Broadway, Brooklyn, NY

**Professional Services through June 21, 2019**

**Professional Personnel**

	Hours	Rate	Amount	
Senior Principal				
OBrien, Sean	1.00	340.00	340.00	
Senior Staff II-B				
Artigas, David	11.50	225.00	2,587.50	
Senior Staff I-A				
Regan, Erin	18.00	165.00	2,970.00	
Totals	30.50		5,897.50	
<b>Total Labor</b>				<b>5,897.50</b>

**Reimbursable Expenses**

Mail & Shipping			8.44	
Airfare, Train, etc.			5.50	
<b>Total Reimbursables</b>		<b>1.1 times</b>	<b>13.94</b>	<b>15.33</b>
		<b>Total this Invoice</b>		<b>\$5,912.83</b>

**Outstanding Invoices**

Number	Date	Balance		
0260378	4/12/2019	3,808.55		
0262938	5/23/2019	810.00		
0263542	6/5/2019	4,952.50		
<b>Total</b>		<b>9,571.05</b>		
		<b>Total Now Due</b>		<b>\$15,483.88</b>

**Billings to Date**

	Current	Prior	Total
Labor	5,897.50	9,565.00	15,462.50
Expense	15.33	6.05	21.38
<b>Totals</b>	<b>5,912.83</b>	<b>9,571.05</b>	<b>15,483.88</b>

cc email Chaim Adler, Cornell Realty

**SIMPSON GUMPERTZ & HEGER INC.**

480 Totten Pond Road, Waltham, MA 02451

main: 781.907.9000 fax: 781.907.9009 [www.sgh.com](http://www.sgh.com)

Boston | Chicago | Houston | New York | San Francisco | Southern California | Washington, DC

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Project	180097.01-DESG	Moxy Hotel BEC Bid and Construction Phas	Invoice	0266147
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BT:EA:NY:00

\ Sean OBrien

\ David Artigas

**SIMPSON GUMPERTZ & HEGER INC.**

480 Totten Pond Road, Waltham, MA 02451

main: 781.907.9000 fax: 781.907.9009 [www.sgh.com](http://www.sgh.com)

Boston | Chicago | Houston | New York | San Francisco | Southern California | Washington, DC

## **EXHIBIT E**

**ROBINSON BROG LEINWAND GREENE GENOVESE & GLUCK P.C.**

**875 THIRD AVENUE**

**NEW YORK, NEW YORK 10022**

—  
(212) 603-6300

—  
FAX (212) 956-2164

May 18, 2021

Fred B. Ringel  
(914) 320-3455  
(212) 603-6301  
fbr@robinsonbrog.com

**VIA Email**

Anna A. Higgins (ahiggins@litigationattys.com)  
Linton Robinson & Higgins LLP  
39 Broadway, Suite 1701  
New York, NY 10006

Re: WB Bridge Hotel LLC, Case No. 20-23288-(RDD) (Jointly Administered)

Dear Ms. Higgins:

On December 21, 2020 (“Petition Date”), WB Bridge Hotel LLC (“WB Bridge”) and 159 Broadway Member LLC (“159 Broadway,” and together, the “Debtors”) each filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code with the Clerk of the United States Bankruptcy Court, Southern District of New York.

An Order for Relief was simultaneously entered upon the filing of each petition, and the cases are being jointly administered under Bankruptcy Case No. 20-23288. A copy of the Notice of Bankruptcy Case Filing for each of the Debtors are attached. Please be further advised that this firm has been retained as counsel to the Debtors.

Please be further advised that under Section 362 of the United States Bankruptcy Code, that the continuation of pre-petition litigation against the Debtors or any actions against the Debtors’ property are automatically stayed. The automatic stay extends to “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title ...” 11 USC §362(a)(1) (emphasis added). Any actions taken in violation of the automatic stay are void ab initio. *See, e.g., Garcia v. Sklar (In re Sklar)* 2021 Bankr. LEXIS 1047 \*2 (Bankr. SDNY April 20, 2021). Any willful violation of the automatic stay provisions of Section 362 of the United States Bankruptcy Code may be deemed contempt of a lawful court order, and the Debtors may seek appropriate remedies in the Bankruptcy Court.

It has come to the Debtors' attention that your client, Simpson Gumpertz & Heger Inc., is moving for a default judgment against WB Bridge in New York Supreme Court, Kings County in the action captioned *Simpson Gumpertz & Heger Inc. v. WB Bridge Hotel LLC and Cornell Realty Management, LLC*, Index No. 513660/2020 (the "State Court Action").

Please be advised that you and your client are stayed from taking any actions, including moving for a default judgment, in the State Court Action against WB Bridge and you are now on actual notice that any such action would violate the automatic stay and may be treated as contempt of court.

If you have any questions concerning the above, please feel free to contact this office.

Be guided accordingly.

Very truly yours,

/s/ Fred B. Ringel

Fred B. Ringel

Encls.

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 12/21/2020 at 1:35 PM and filed on 12/21/2020.

**WB Bridge Hotel LLC**  
c/o GC Realty Advisors, LLC  
3284 N. 29th Court  
Hollywood, FL 33020  
Tax ID / EIN: 82-3412355



The case was filed by the debtor's attorney:

**Fred B. Ringel**  
Robinson Brog Leinwand Greene Genovese &  
Gluck P.C.  
875 Third Avenue  
9th Floor  
New York, NY 10022  
(212) 603-6300

The case was assigned case number 20-23288-rdd to Judge Robert D. Drain.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.nysb.uscourts.gov> or at the Clerk's Office, 300 Quarropas Street, White Plains, NY 10601.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Vito Genna**  
**Clerk, U.S. Bankruptcy Court**

Transaction Receipt

05/18/2021 11:32:50			
<b>PACER Login:</b>	Rblggg8759	<b>Client Code:</b>	104080.0000
<b>Description:</b>	Notice of Filing	<b>Search Criteria:</b>	20-23288-rdd
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10

## Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 12/21/2020 at 1:42 PM and filed on 12/21/2020.

**159 Broadway Member LLC**  
c/o GC Realty Advisors LLC  
3284 N. 29th Court  
Hollywood, FL 33020  
Tax ID / EIN: 82-3488239



The case was filed by the debtor's attorney:

**Fred B. Ringel**  
Robinson Brog Leinwand Greene Genovese &  
Gluck P.C.  
875 Third Avenue  
9th Floor  
New York, NY 10022  
(212) 603-6300

The case was assigned case number 20-23289-rdd to Judge Robert D. Drain.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.nysb.uscourts.gov> or at the Clerk's Office, 300 Quarropas Street, White Plains, NY 10601.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Vito Genna**  
**Clerk, U.S. Bankruptcy Court**



Transaction Receipt

05/18/2021 11:33:46			
<b>PACER Login:</b>	Rblggg8759	<b>Client Code:</b>	104080.0000
<b>Description:</b>	Notice of Filing	<b>Search Criteria:</b>	20-23289-rdd
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10